

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LEARNING ANNEX HOLDINGS, LLC,
LEARNING ANNEX, LLC, and
and LEARNING ANNEX, L.P.,

Plaintiffs,

09-CV-4432 (SAS/GWG)

- against -

RICH GLOBAL, LLC and
CASHFLOW TECHNOLOGIES, INC.,

Defendants.

-----X

PLAINTIFFS' OBJECTIONS TO RICH DAD'S
DEPOSITION DESIGNATIONS & COUNTER-DESIGNATIONS

Jonathan Harris
Julie Withers
Alexander Sakin
Harris & Houghteling LLP
111 Broadway, Suite 402
New York, New York 10006
Tel. (212) 397-3370
Fax (212) 202-6206
Jon@harrislawny.com

Edwin G. Schallert
Michael Schaper
Megan K. Bannigan
Debevoise & Plimpton LLP
919 Third Avenue
New York, New York 10022

David Deitch
Ifrah PLLC
1717 Pennsylvania Ave, NW, Ste 650
Washington DC 20006
Attorneys for Plaintiffs

Rich Dad's Designations¹	Plaintiffs' Objections²	Plaintiffs' Counter-Designations³
Sharon Lechter (11/19/09)		
52:11-53:21	Relevance; misleading; prejudicial	
55:23-60:9	Relevance; confusing; misleading; prejudicial	
103:13-106:5	Relevance; form; hearsay	
121:13-25	Not admitted at first trial; misleading; confusing; prejudicial	121:5-121:12
Morris Orens (7/26/10)		

¹ Defendant reserves the right to supplement its designations in the event that the Court allows into evidence facts that Defendant is seeking to exclude in its motions *in limine*.

² Plaintiffs object to each designation that was not admitted at the first trial as part of Plaintiffs' Motion *in Limine* seeking to exclude, *inter alia*, new fact witnesses and exhibits at re-trial. See dkt. entry no. 155.

³ To the extent they fall outside of previously designated testimony, these counter-designations are listed only in the event that the Court allows Defendants' new designations.

43:8-44:25	Not admitted at first trial; prejudicial; misleading; form	40:17-43:7
67:13-68:25	Not admitted at first trial	69:2-70:22
93:13-96:2	Not admitted at first trial; form; misleading; prejudicial	92:13-93:12; 96:3-96:19
97:19-107:5	Not admitted at first trial; relevance; form; prejudicial; hearsay	
108:21-109:19	Not admitted at first trial; relevance; misleading; prejudicial; form	
111:13-115:19	Not admitted at first trial; relevance	115:21-116:10
117:20-120:11	Not admitted at first trial	
121:3-24	Not admitted at first trial; hearsay; misleading; prejudicial	122:14-19
125:2-128:20	Not admitted at first trial; relevance; form; misleading; prejudicial	
153:10-154:8	Not admitted at first trial; relevance; misleading	